

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

PAMELA G. CAPPETTA)	
<i>on behalf of herself and those similarly situated</i>)	
Plaintiff,)	
)	
v.)	Civil Action
)	No. 3:08cv288
GC SERVICES, LP)	
)	
Defendant.)	
)	

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

COMES NOW the Plaintiff, by counsel, and moves for partial summary judgment against Defendant GC Services, L.P. for the reasons more fully set forth in her memorandum in support filed contemporaneously herewith. Specifically, she seeks a pre-trial determination by this Court pursuant to Rule 56(d) that she was not an obligor on her ex-husband's American Express account, or obligated to pay any portion thereof. She additionally seeks partial summary judgment on Count Three of her Second Amended Complaint brought pursuant to the Fair Debt Collection Practices Act.

Respectfully submitted,
PAMELA G. CAPPETTA,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of October, 2009 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

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